

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**DETROIT, MICHIGAN**

**JUNE 09, 2021 1**

ALAM et. al. v. ALJAZEERA English et. al.

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1. DR. RABBI ALAM, and
2. SHERE ALAM, and
3. RIZVI ALAM, and
4. THE BANGABANDHU PARISHAD USA, and
5. THE BANGABANDHU COMMISSION USA.

PLAINTIFF(s),

vs

CASE NO. 2:2021cv10389  
HONORABLE LINDA V. PARKER

1. AL JAZEERA ENGLISH, and (USA)
  2. KANAK SARWAR, and (USA)
  3. ELIAS HOSSAIN, and (USA)
  4. DELWAR HOSSAIN, and (CANADA)
  5. DAVID BERGMAN, and (QATAR)
  6. JULKERNER SAYER, and (QATAR)
  7. AL JAZEERA MEDIA NETWORKS, and (QATAR)
  8. TASNEEM KHALIL, and (QATAR)
  9. AL JAZEERA AMERICA, and (USA)
  10. MOSTEFA SOUAG and (QATAR)
  11. AL JAZEERA INTERNATIONAL USA INC., et al. (USA)
- DEFENDANT(s).
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**PLAINTIFF'S MOTION TO REQUEST FOR DEFAULT JUDGEMENT AGAINST  
DEFENDANT AL JAZEERA ENGLISH**

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**FACTS AND RULES**

NOW COMES the Plaintiff(s), DR. RABBI ALAM, SHERE ALAM, and RIZVI ALAM are proceeding as PRO SE Litigators and bring this Motion to request for Default Judgement against Defendant AL Jazeera English. On June 05, 2021, Saturday,

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PLaintiffs filed a Request for Clerk's Entry of Default. On June 08, 2021, Monday, the Clerk entered a default against Defendant AL Jazeera English in case 2:21-cv-10389. The Request to enter the Default against Defendant Al Jazeera was the Docket #18. As to Docket # 20, represents the Clerk's Entry of Default against Defendant AL Jazeera English.

On May 03, 2021, Defendant Al Jazeera English was served with summon, well pleaded complaint and affidavit of service at Defendant's Washington DC Location at 1200 New Hampshire N.W., 2nd Floor, Washington D.C. 20035, USA address. The United States Postal Service provided "Certified Mail of Return Service" FS Form 38811 with Article Number which was transferred from the service Label as "7019-2970-0000-1682-2376" was signed by Defendant Corporation. On behalf of the Defendant and it's corporation someone named by "Marcia McLead" or "Marcia Myead" signed the summon, complaints and the affidavit.

Federal rules of Civil Procedures and Michigan court rules provided on the Summon and it clearly states that " A lawsuit has been filed against you. Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: "DR. RABBI ALAM, 1221 BOWERS STREET, NO 1163, BIRMINGHAM, MICHIGAN, MI 48009, USA."

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The summon also includes: “If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.”

Here, the Defendant was served on May, 03, 2021 and Defendant is not within the category of Fed. R. Civ. P. 12 (a)(2) or (3). Defendant is not the United States nor an agency of the United States nor an officer of an agency. Therefore, Defendant AL Jazeera Falls within the Fed. R. Civ. P. 12 (a) (1) category, where such Defendants have 21 days to respond to the summon and complaint by answering and or making motions. Since Defendant AL Jazeera was served on May 3, 2021 it must have responded or submitted an answer or would have filed a motion on or before May 24, 2021. Also, Plaintiff likes to ask this court to note that Defendant neither waived their services nor have made any effort to communicate with the Plaintiffs. Therefore, Defendant Al Jazeera English failed to follow the Fed. R. Civ. P. 12 (a) (1) to comply within 21 days rule to respond.

Federal Rule of Civil Procedure 55(a) states: “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by these rules and that fact is made to appear by affidavit or otherwise, the clerk shall enter the party’s default.” Federal Rule of Civil Procedure 55(b)(2) states that upon application by the party, the Court may enter a Judgment by Default. Rule 55(b)(2) further provides: “If, in order to enable the court to enter judgment or to carry it into effect, it is necessary to take an account or to determine the amount of damages or to

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establish the truth of any averment by evidence or to make an investigation of any other matter, the court may conduct such hearings or order such references as it deems necessary and proper”

As of June 09, 2021, the Defendant AL Jazeera English failed to respond to the Complaint, Al Jazeera English failed to make any motion in any affirmative defenses. Defendant Al Jazeera failed to follow the Fed. R. Civ. P. 12 (a) (1), 21 days rule and now clearly in violation of this federal rules and procedures. As a result the Plaintiffs requested the United States Federal Court Clerk of the Eastern District of Michigan to Enter Default against the Defendant AL Jazeera English and the Clerk had entered the default in Plaintiff's favour on the June 7th, 2021, pursuant to Fed. R. Civ. P. 12 (a) (1).

Now, Defendants did not move the Court to Set Aside the Clerk's Order of Default pursuant to Fed. R. Civ. P. 55(c). Defendant Al Jazeera English did not make any move to date June 9, 2021.

**ARGUMENT**

Plaintiffs respectfully argue that the defendant AL Jazeera English failed to follow the Federal rules of Procedures and inviolation of the laws. Plaintiffs request this honorable court for a Default Judgement against the Defendant AL Jazeera English in the following two ways.

- i). Plaintiffs seeks an Injunctive Order against Defendant AL Jazeera English and
- ii). Plaintiff seeks Damages of \$500,000,000 in Defamatory and Punitive in Nature.

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**RELIEF REQUESTED**

Plaintiffs request that with the preponderance of evidence there is at least one genuine issue of material fact and beyond a reasonable doubt, with a good faith, the Plaintiffs request this honourable Judge and the Court to grant this motion for the Default Judgement Against Defendant Al Jazeera English the following two (i) an Injunctive Relief that the Defendant remove all materials that is related to the Movie "ALL THE PRIME MINISTER'S MEN" and Issues a Press Note of International Apology to Bangladesh and it's Prime Minister Sheikh Hasina and make it Public that the Movie "ALL THE PRIME MINISTER'S MEN" is removed. And (ii) a Defamatory and Punitive Damages of \$500,000,000.

**CONCLUSION**

Plaintiffs beg and respectfully request the Honorable court to focus on Defendant's recklessness and substandard duty of care in Publication. Defendant is an Internationally operated Media, News agency and organization must be responsible for its own malicious action. Defendant Knowingly, recklessly, maliciously and intentionally destroyed the reputation of Bangladesh by calling them Mafia States and calling Prime Minister Sheikh Hasina as Mafia Head. Bangladesh is a developing country and is at its cutting edge and Defendants syndicated with enemies of State of Bangladesh and destroying it's growing name and fame in the international platform. The Plaintiffs DR. RABBI ALAM, RIZVI ALAM and SHERE ALAM are asking this honorable court to grant

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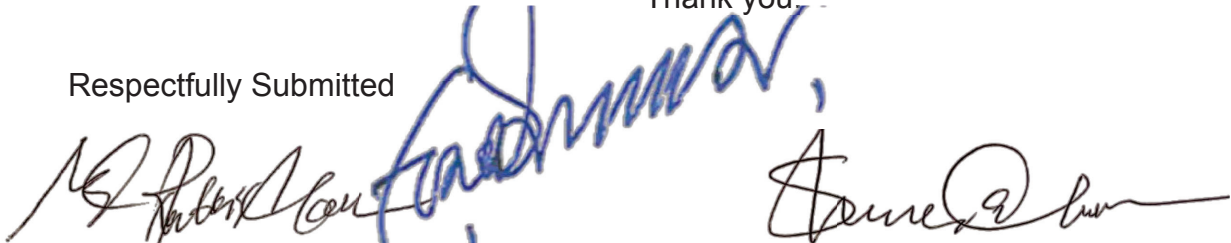
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this motion to serve justice. Justice is critical for the Plaintiffs and we depend on the adequacy and the fairness of this court for it's judgement and procedures.

Thank you.

Respectfully Submitted



Dr. RABBI ALAM, RAJVI ALAM, MA, MBA, Agriculturist SHERE ALAM

Plaintiffs, 1221, BOWERS ST #1163.  
Birmingham, Michigan 48009  
Primary Phone: (816) 372-1873  
TEL: (844) 556-8333

Dated: JUNE 09, 2021

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**CERTIFICATE OF SERVICE**

I am DR. Rabbi Alam, I am certifying and testifying that on the 08th day of JUNE, 2021, I personally filed the following document(s) electronically/via the United States Postal Services with the Clerk of the Court using the PACER MI-ECF System which will send notification of such filing to all ECF participants in this case:

Documents Served:

- Plaintiffs' Motion to request a Default Judgement against the Defendant AL Jazeera English.
- Court's Permanent Injunctive Relief Order for the Defendant AL Jazeera English to remove the Movie "ALL THE PRIME MINISTER'S MEN" and all related content from the Internet.



DR RABBI ALAM,



RIZVI ALAM



SHERE ALAM,

Plaintiffs, 1221 Bowers ST #1163, Birmingham, Michigan 48009

Telephone: (816) 372-1873. Email: [president@bbpusa.org](mailto:president@bbpusa.org)